

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DEBT CLEANSE GROUP LEGAL
SERVICES, LLC, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

GOTO TECHNOLOGIES USA, INC., and
LASTPASS US LP,

Defendants.

Case No. 1:22-cv-12047-PBS

**DEFENDANTS GOTO TECHNOLOGIES USA, INC. AND LASTPASS US LP'S
CONSENT MOTION TO STAY PROCEEDING**

Defendants GoTo Technologies USA, Inc. and LastPass US LP (“Defendants”), in accordance with Federal Rule of Civil Procedure 6(b), move the Court for an order staying the proceeding, including Defendants’ deadline to respond to the Complaint, until the Court has an opportunity to determine Plaintiff Debt Cleanse’s (“Plaintiff”) motion to consolidate and appoint interim class counsel. Plaintiff consents to and does not oppose the relief sought in this motion. The reasons for this motion are set forth in Defendants’ accompanying memorandum in support.

Dated: February 27, 2023

By: /s/ Raymond P. Ausrotas
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LOCAL RULE 7.1(A)(2) CERTIFICATION

Counsel for Defendants GoTo Technologies USA, Inc. and LastPass US LP hereby certifies that we have conferred with Plaintiff's counsel, who stated on February 27, 2023 that Plaintiff assents to and does not oppose this motion.

/s/ Raymond P. Ausrotas
Raymond P. Ausrotas (BBO No. 640315)

CERTIFICATE OF SERVICE

By signing below, I hereby certify that this document was filed February 27, 2023 through the ECF system and will be served electronically to the registered participants as identified in the Notice of Electronic Filing.

/s/ Raymond P. Ausrotas
Raymond P. Ausrotas (BBO No. 640315)